

Via ECF

April 10, 2023

Hon. Lorna G. Schofield
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

**Re: *The Travelers Indem. Co., et al. v. Northrop Grumman Corp., et al.*,
Case No. 16-civ-8778-LGS [rel. 1:12-cv-03040-KBF]**

Dear Judge Schofield:

Pursuant to the Court's October 12, 2022 Order (ECF 469) ("Stay Order"), we write on behalf of The Travelers Indemnity Company and The Travelers Indemnity Company of Connecticut ("Travelers"), Century Indemnity Company ("Century"), and Northrop Grumman Corporation and Northrop Grumman Systems Corporation ("NG") (collectively, "the Parties"), to provide an update regarding the status of the underlying *Romano* lawsuit. This is the fourth status letter in response to the Stay Order.

Consistent with the Parties' statements in their November 25 letter (ECF 472), the below is NG's status summary of the *Romano* lawsuit:

1. Since we submitted the prior status letter, there have been no changes to the status of the *Romano* lawsuit.
2. As noted in the prior status letter, at present the parties are briefing the *Romano* plaintiffs' class certification motion and the parties' *Daubert* motions related to class certification experts. Under the current schedule, which was referenced in our prior letters and remains the operative schedule, these motions will be fully briefed, and filed with the court, on May 31, 2023. As previously noted, the *Romano* court has not yet established any deadlines for any proceedings after that date.
3. More specific information regarding the ongoing briefing schedule is below:
 - a) Class Certification Briefing: On October 29, 2021, the *Romano* plaintiffs served their class certification motion. On June 10, 2022, the defendants ("NG") served their opposition. On December 15, 2022, the *Romano* plaintiffs served their reply.
 - b) Experts and Daubert Briefing: On June 10, 2022, NG served *Daubert* motions as to five of the plaintiffs' experts. On December 15, 2022, the *Romano* plaintiffs served rebuttal expert reports; *Daubert* motions as to three of NG's experts; and, oppositions to NG's *Daubert* motions. Under the current schedule: (1) NG's oppositions to plaintiffs' *Daubert* motions, and NG's replies in support of its *Daubert* motions, are due on April 12, 2023; and (2) the *Romano* plaintiffs' replies in support of their *Daubert* motions are due on May 31, 2023, at which time the plaintiffs will file their fully briefed class certification motion and the parties' *Daubert* motions.

In accordance with the Stay Order, the Parties will file the next status letter regarding the *Romano* litigation on or before May 25, 2023.

Respectfully submitted,

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